United States District Court
Southern District of Texas
FILED
NOV 23 2016
David J. Bradley, Clerk

United States District Court

SOUTHERN DISTRICT OF **TEXAS**

McALLEN DIVISION

UNITED STATES OF AMERICA
V.

Armando Ramon Jr. *PRINCIPAL*
YOB: 1978
USC

(Name and Address of Defendant)

CRIMINAL COMPLAINT

Case Number:

M-16-2174-M

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about **November 22, 2016** in **Starr** County, in the Southern District of Texas defendants(s) did,

(*Track Statutory Language of Offense*)

knowing or in reckless disregard of the fact Angel Antonio Chicas-Soriano, a citizen and national of El Salvador, along with one (1) other undocumented alien, for a total of two (2), who had entered the United States in violation of law, did knowingly transport, or move or attempts to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Roma, Texas to the point of arrest near Roma, Texas,

in violation of Title **8** United States Code, Section(s) **1324(a)(1)(A)(ii)** **FELONY**

I further state that I am a(n) **U.S. Senior Border Patrol Agent** and that this complaint is based on the following facts:

On November 22, 2016, a Texas Department of Public Safety (DPS) Trooper requested assistance on a vehicle stop to determine the citizenship of two subjects.

Upon arriving at the vehicle stop, which was conducted at the Texaco Store on U.S. Highway 83 in Roma, Texas, agents made contact with Trooper Moises. Trooper Moises advised agents that Texas DPS Criminal Investigator Ramos was walking into the Jack in the Box in Roma, Texas when he observed two bodies running from the river and load into a white Ford TGL. Criminal Investigator Ramos advised Trooper Moises, who was near the area, of what he witnessed. Trooper Moises conducted a vehicle stop due to all three subjects were not wearing their seatbelts. Trooper Moises stated that he interviewed the driver and the passengers by asking for any type of identification. The driver was identified as Armando Ramon Jr., who was in possession of a Texas ID card, neither of the other two passengers had any type of identification.

Continued on the attached sheet and made a part of this complaint: [X] Yes [ ] No

Approved by

Signature of Complainant

Jon M. Chan **Senior Patrol Agent**
Printed Name of Complainant

Sworn to before me and subscribed in my presence,

November 23, 2016 at **McAllen, Texas**
Date City and State

B. Janice Ellington, **U. S. Magistrate Judge**
Name and Title of Judicial Officer

Signature of Judicial Officer

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS

ATTACHMENT TO CRIMINAL COMPLAINT:

M-16-2174-M

RE: Armando Ramon Jr.

CONTINUATION:

Agents arrived and approached the passengers in the vehicle, identified themselves as Border Patrol Agents and questioned the two passengers as to their citizenship and immigration status in the United States. The two passengers admitted to being citizens and nationals of El Salvador and illegally in the United States, without the necessary Immigration documents to be or remain in the United States legally. The driver, Armando Ramon Jr., was determined to be a United States Citizen. All three subjects were placed under arrest and transported to the Rio Grande City Border Patrol Station for processing.

Principal Statement:

Armando RAMON, a United States Citizen, was advised of his Miranda Rights, stated he understood his rights and was willing to answer questions without the presence of an attorney.

RAMON claims he was dropping off his kids at school when he received a phone call from a female friend who asked him to pick up her cousin and her cousin's boyfriend. RAMON drove to Jack in the Box where he got out of his vehicle and went up to the only two people in the restaurant. RAMON asked them if they were his female friend's cousins and he stated that they acknowledged that they were. RAMON told them he was there to give them a ride. After leaving the Jack in the Box, RAMON stated he was pulled over by DPS because the back passengers were not wearing seatbelts. RAMON stated he has smuggled undocumented aliens before and that he is currently on probation for smuggling undocumented aliens.

Material Witness Statement:

Angel Antonio CHICAS-Soriano, a citizen and national of El Salvador was advised of his Miranda Rights, stated he understood his rights and was willing to answer questions without the presence of an attorney.

CHICAS stated he made his smuggling arrangements and paid 9,000 USD to an unknown smuggler in El Salvador. After crossing the river, the guide told him and a female to run towards a restaurant. Once at the restaurant, he received a phone call from someone who advised him that a white car with a male driver was waiting in the parking lot. CHICAS stated he got into the back seat, the car drove off and was pulled over moments later. CHICAS described the male driver of the car as a bald man with a full beard, tattoos on his arms and was wearing a shirt with a logo on the back.

Angel Antonio CHICAS-Soriano positively identified Armando Ramon Jr. as the driver of the vehicle.